

Exhibit A to Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,)	
STATE OF OHIO, EX REL.)	
RICHARD CORDRAY)	
OHIO ATTORNEY GENERAL,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Action No.
INEOS ABS (USA) Corporation,)	
LANXESS Corporation,)	
)	
)	
Defendants.)	
)	

NOTICE OF LODGING

Consistent with 28 C.F.R. § 50.7, the United States is hereby lodging the attached proposed Consent Decree ("Consent Decree") in the above captioned case that resolves claims relating to the Clean Air Act, 42 U.S.C. § 7401 *et seq.*; the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11001 *et seq.*; and the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C. § 9601 *et seq.* The Court should not sign the Consent Decree at this time. Instead, the Consent Decree should

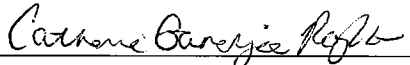
remain lodged with the Court while the United States provides an opportunity for public comment pursuant to 28 C.F.R. § 50.7.

The Department of Justice will publish in the *Federal Register* a notice that the Consent Decree has been lodged with the Court. The Notice will solicit public comment for a period of thirty (30) days. At the conclusion of the public comment period, the United States will evaluate any comments received, determine whether any comments disclose facts or considerations which indicate that the proposed settlement is inappropriate, inadequate or improper, and advise the Court whether the United States requests that the Consent Decree be entered.

Respectfully Submitted,

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By:


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CERTIFICATE OF SERVICE

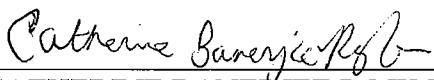
I hereby certify that on the 31st day of July 2009, a true and correct copy of the Complaint and Exhibit A thereto (Notice of Lodging), and attached Consent Decree in *United States, et al.* v. *INEOS, et al.*, were served on the following counsel by first class mail properly addressed:

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